

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA

v.

ERIN SEARLES

No.

INFORMATION

The United States Attorney charges:

**COUNT ONE
(False Statements During the Purchase of Firearms)**

On about June 29, 2022, June 30, 2022, and August 11, 2022, within the district of Maine, the defendant,

ERIN SEARLES

knowingly made false statements and representations to Federal Firearms Licensees (“FFLs”) licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the FFLs’ records. Specifically, the defendant executed Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Forms 4473, Firearms Transaction Records, in connection with her attempted purchases of the following firearms:

| DATE | FFL | Firearm Description |
|---------------|--|---|
| June 29, 2022 | Northeastern Firearms LLC Turner, Maine | Glock, model 23 gen 5, .40 caliber pistol, serial number BXHP151 |
| June 30, 2022 | Northeastern Firearms LLC Turner, Maine | Glock, model 26 gen 5, 9mm pistol, serial number AFYU261 |

| | | |
|-----------------|--|---|
| June 30, 2022 | Northeastern Firearms LLC, Turner Maine | Glock, model 30S, .45 caliber pistol, serial number BXHV337 |
| August 11, 2022 | G3 Firearms Turner, Maine | Glock, model 23 gen 3, .40 caliber pistol, serial number BXDK781 |
| August 11, 2022 | G3 Firearms Turner, Maine | Glock, model 27 gen 5, .40 caliber pistol, serial number BXMU247 |

On the Forms 4473 describing each of the above purchases, the defendant misrepresented as true, correct, and complete in Section B, Box 21.a, that she was the actual transferee/buyer of the firearms, and was not buying them on behalf of another person, when in fact, the defendant purchased the firearms at the direction of, and with funds provided by, a coconspirator (“CC-1”).

In this way, the defendant violated Title 18, United States Code, Section 924(a)(1)(A).

FIRST FORFEITURE ALLEGATION

Upon conviction of the firearms offense charged in Count One of this Indictment, the defendant,

ERIN SEARLES

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved

or used in the knowing commission of the offense, including but not limited to, the Glock, model 23 gen 3, .40 caliber pistol, bearing serial number BXDK781.

Dated: May 26, 2023

/s/Noah Falk
Noah Falk
Assistant United States Attorney